

# **EXHIBIT 15**

## **Redacted Excerpts of Deposition of Denitza Batchvarova**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON	)	
FITCH, on behalf of	)	
themselves and all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No.
	)	2:15-cv-01045-RFB-(PAL)
	)	
ZUFFA, LLC, d/b/a Ultimate	)	
Fighting Championship and	)	
UFC,	)	
	)	
Defendant.	)	
_____	)	

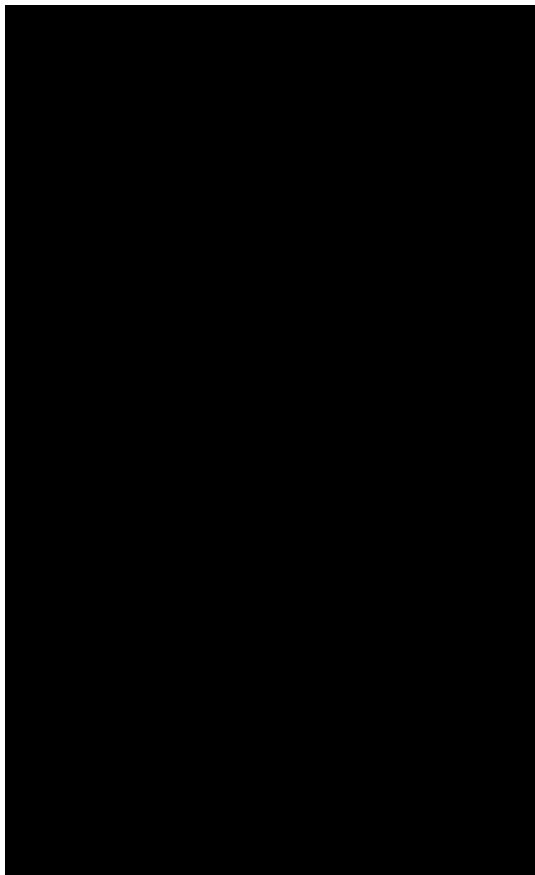
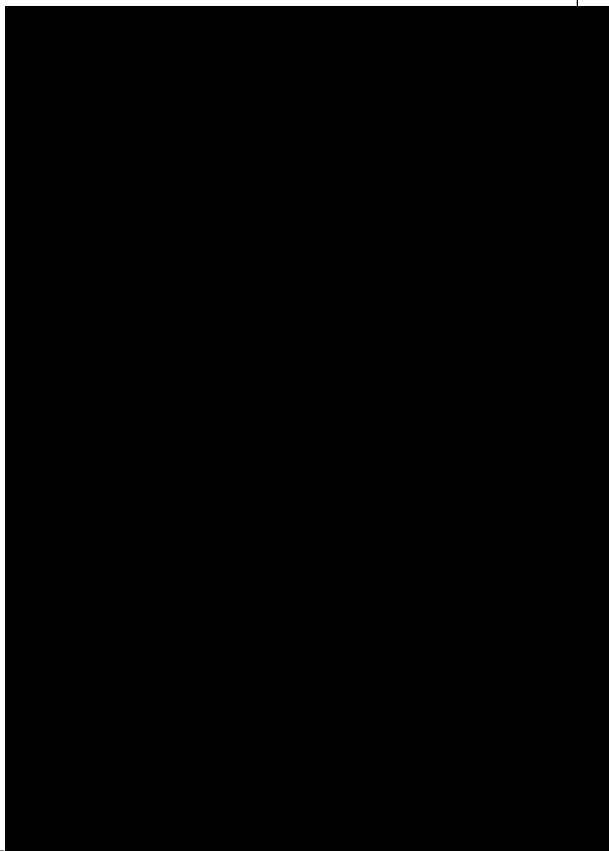
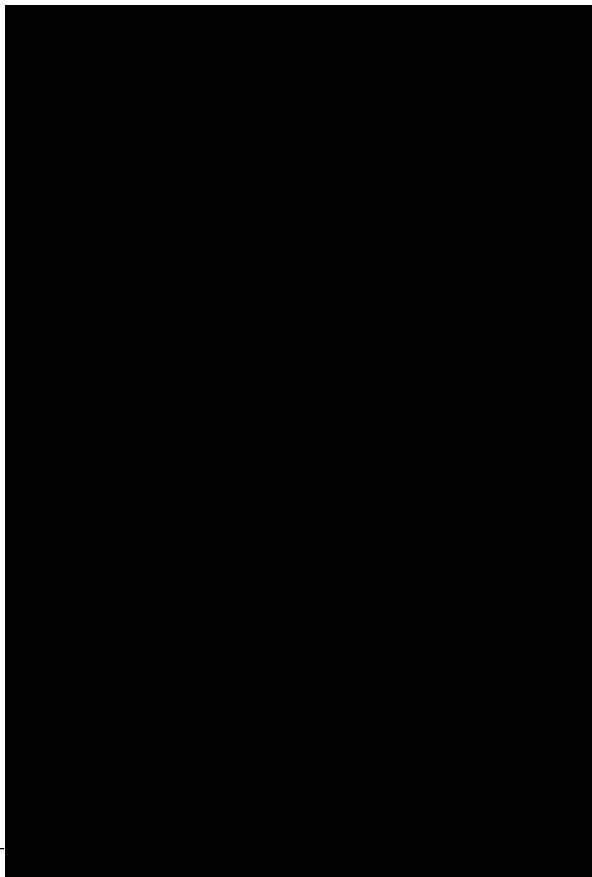

VIDEOTAPED DEPOSITION OF DENITZA BATCHVAROVA

Las Vegas, Nevada

January 25, 2017

9:11 A.M.

Reported by:  
Sarah Padilla, CCR NO. 929  
Job No. 48403

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8 (Pages 26 to 29)

8 (Pages 26 to 29)

<div>62</div> <div>1 Q Okay. Do you know if fighters at the time</div> <div>2 were being compensated under that interpretation?</div> <div>3 A I believe so. There was nothing that</div> <div>4 would lead me to believe we weren't compensating our</div> <div>5 athletes based on our agreements with them.</div> <div>6 Q Okay. So I am handing you what has been</div> <div>7 marked Exhibit 101, which is Bates stamped</div> <div>8 ZFL-1103001 and attachment Bates stamp ZFL-1103002.</div> <div>9 (Exhibit 101 was marked.)</div> <div>10 BY MR. SILVERMAN:</div> <div>11 Q Let me know when you have had a chance to</div> <div>12 look through it.</div> <div>13 A Okay.</div> <div>14 Q Did you write this e-mail in the ordinary</div> <div>15 course of business?</div> <div>16 A I did.</div> <div>17 Q And did you draft the attachment as well?</div> <div>18 A I did.</div> <div>19 Q Okay. Can you describe what the</div> <div>20 attachment is?</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>	<div>64</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 [REDACTED]</div> <div>11 [REDACTED]</div> <div>12 [REDACTED]</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>
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17 (Pages 62 to 65)

<div>74</div> <div>1 don't think we even got to putting together a list</div> <div>2 of, "Hey, who is coming up?" I know that Tracy Long</div> <div>3 always has a list of contracts that are expiring.</div> <div>4 So I think that is probably where it would have gone</div> <div>5 anyhow.</div> <div>6 <b>Q Was this plan shared with Lorenzo, do you</b></div> <div>7 <b>know?</b></div> <div>8 A I don't recall.</div> <div>9 <b>Q Did you ever have any meetings with anyone</b></div> <div>10 <b>about this plan?</b></div> <div>11 A Besides Nakisa who I sent this to, I don't</div> <div>12 believe it got anywhere further.</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>	<div>76</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 [REDACTED]</div> <div>11 [REDACTED]</div> <div>12 [REDACTED]</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>
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20 (Pages 74 to 77)

<p style="text-align: right;">198</p> <p>1 [REDACTED]  2 [REDACTED]  3 [REDACTED]  4 <b>Q I'm handing you what has been marked as</b>  5 <b>Exhibit 122. And it is Bates stamped ZFL-2508353</b>  6 <b>and attachment ZFL-2508355.</b>  7 <b>(Exhibit 122 was marked.)</b>  8 BY MR. SILVERMAN:  9 <b>Q If you look at the e-mail on top, you are</b>  10 <b>CC'd on this; is that right?</b>  11 A Yes, I am.  12 <b>Q Can you tell me what the attached --</b>  13 [REDACTED]  14 [REDACTED]  15 [REDACTED]  16 [REDACTED]  17 <b>Q And do you know what the purpose of this</b>  18 <b>attached presentation was?</b>  19 A I don't know. I am not aware of it.  20 <b>Q Do you know why Nakisa Bidarian CC'd you</b>  21 <b>on the e-mail with this presentation attached?</b>  22 [REDACTED]  23 [REDACTED]  24 [REDACTED]  25 [REDACTED]</p>	<p style="text-align: right;">200</p> <p>1 questions. I think you are done. We are all done.  2 MS. LYNCH: Okay. If we can just take five  3 minutes so that I can talk to Brent and just see if  4 we have any follow-up questions.  5 MR. SILVERMAN: Sure.  6 THE VIDEOGRAPHER: We are off the video  7 record. The time is 4:05 P.M.  8 (A short recess was taken.)  9 THE VIDEOGRAPHER: We are back on the video  10 record. The time is 4:15 P.M. You may proceed.  11 -----  12 CROSS-EXAMINATION  13 -----  14 BY MS. LYNCH:  15 <b>Q Hi. This is Marcy Lynch. On the record I</b>  16 <b>am just going to ask you a couple of follow-up</b>  17 <b>questions. If you can turn back to Exhibit 119 that</b>  18 [REDACTED]  19 [REDACTED]  20 [REDACTED]  21 [REDACTED]  22 [REDACTED]  23 [REDACTED]  24 [REDACTED]  25 [REDACTED]</p>
<p style="text-align: right;">199</p> <p>1 [REDACTED]  2 [REDACTED]  3 [REDACTED]  4 [REDACTED]  5 [REDACTED]  6 [REDACTED]  7 [REDACTED]  8 [REDACTED]  9 [REDACTED]  10 [REDACTED]  11 [REDACTED]  12 [REDACTED]  13 [REDACTED]  14 [REDACTED]  15 [REDACTED]  16 [REDACTED]  17 [REDACTED]  18 [REDACTED]  19 [REDACTED]  20 [REDACTED]  21 [REDACTED]  22 [REDACTED]  23 [REDACTED]  24 [REDACTED]  25 MR. SILVERMAN: Okay. I think that is all my</p>	<p style="text-align: right;">201</p> <p>1 [REDACTED]  2 [REDACTED]  3 [REDACTED]  4 [REDACTED]  5 [REDACTED]  6 [REDACTED]  7 [REDACTED]  8 [REDACTED]  9 [REDACTED]  10 <b>Q Between 2008 and the date of this</b>  11 <b>presentation in 2014, had the UFC raised ticket</b>  12 <b>prices on Pay-Per-View events?</b>  13 A No, we had not raised prices. We raised  14 Pay-Per-View prices by \$5 in 2015, which was the  15 first time since 2008.  16 [REDACTED]  17 [REDACTED]  18 [REDACTED]  19 [REDACTED]  20 [REDACTED]  21 [REDACTED]  22 [REDACTED]  23 [REDACTED]  24 [REDACTED]  25 [REDACTED]</p>

<div>202</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 [REDACTED]</div> <div>11 [REDACTED]</div> <div>12 [REDACTED]</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>	<div>204</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 [REDACTED]</div> <div>11 [REDACTED]</div> <div>12 [REDACTED]</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div>
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52 (Pages 202 to 205)

<p style="text-align: right;">206</p> <p>1 A Yes, multiple. Both here and the Vegas 2 market, outside of the Vegas market, yes, there are. 3 <b>Q Okay. I don't have any other questions.</b> 4 MR. SILVERMAN: Okay. 5 THE VIDEOGRAPHER: This concludes today's 6 deposition of Denitza Batchvarova on January 25, 7 2017. The time is 4:23 P.M. We are off the video 8 record. 9 (TIME NOTED: 4:23 P.M.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">208</p> <p>1 STATE OF NEVADA) 2 ) ss 3 COUNTY OF CLARK) 4 5 I, Sarah Padilla, a duly commissioned and 6 licensed court reporter, Clark County, State of Nevada, 7 do hereby certify: That I reported the taking of the 8 deposition of the witness, Denitza Batchvarova, 9 commencing on Wednesday, January 25, 2017, at 9:11 A.M.; 10 That prior to being examined, the witness was, by me, 11 duly sworn to testify to the truth; That thereafter I 12 transcribed my shorthand notes into typewriting and 13 that the typewritten transcript of said deposition is a 14 complete, true, and accurate record of said shorthand 15 notes. I further certify that I am not a relative 16 or employee of any attorney or counsel of any of the 17 parties nor a relative or employee of an attorney or 18 counsel involved in said action, nor a person 19 financially interested in the action; that a request 20 [x] has [ ] has not been made to review the transcript. 21 IN WITNESS WHEREOF, I have hereunto set my 22 hand in the County of Clark, State of Nevada, this 14th 23 day of February. 24 25 SARAH PADILLA, CCR 929</p>
<p style="text-align: right;">207</p> <p>1 2 STATE OF _____ ) 3 ) :ss 4 COUNTY OF _____ ) 5 6 7 I, DENITZA BATCHVAROVA, the 8 witness herein, having read the foregoing 9 testimony of the pages of this deposition, 10 do hereby certify it to be a true and 11 correct transcript, subject to the 12 corrections, if any, shown on the attached 13 page. 14 15 16 DENITZA BATCHVAROVA 17 18 19 20 Sworn and subscribed to before 21 me, this _____ day of 22 _____, 2017. 23 24 25 Notary Public</p>	<p style="text-align: right;">209</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over carefully 4 and make any necessary corrections. You should state 5 the reason in the appropriate space on the errata 6 sheet for any corrections that are made. 7 After doing so, please sign the errata sheet 8 and date it. 9 You are signing same subject to the changes 10 you have noted on the errata sheet, which will be 11 attached to your deposition. 12 It is imperative that you return the original 13 errata sheet to the deposing attorney within thirty 14 (30) days of receipt of the deposition transcript by 15 you. If you fail to do so, the deposition transcript 16 may be deemed to be accurate and may be used in court. 17 18 19 20 21 22 23 24 25</p>



WITNESS' SIGNATURE                      DATE